

Hearing Date and Time: January 29, 2014 at 10:00 a.m.

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-and-

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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re

LEHMAN BROTHERS HOLDINGS INC., *et al.*,

Debtors.

CHAPTER 11

CASE NO. 08-13555 (JMP)

**JOINDER OF FIRST TRUST STRATEGIC HIGH INCOME FUND II  
IN RESPONSES AND OBJECTIONS OF CERTAIN OTHER DEFENDANTS**

NOW COMES First Trust Strategic High Income Fund II (“*FHY*”) by and through its counsel and, in addition to the relief requested in the Limited Objection of First Trust Strategic High Income Fund II to Lehman Brothers Holdings, Inc. Motion to Extend Stay of Avoidance Actions [Dkt. No. 42023] (Dkt. No. 42123), to join and adopt the following responses and objections filed in this matter (the “*Joined Objections*”):<sup>1</sup>

- Response in Opposition to the Motion of Lehman Brothers Holdings Inc., Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rule 7004(a)(1) to Extend Stay

<sup>1</sup>

As of this writing, counsel for Debtors have circulated, but not filed, a revised proposed order which addresses some, but not all, of FHY’s objections and the Joined Objections. Conversations between counsel continue, and FHY reserves the right to modify or withdraw any objections as appropriate in light of any subsequent filing(s) by Debtors.

of Avoidance Actions and Grant Certain Related Relief, filed on behalf of **Principal Life Insurance Company [Dkt. No. 42119]**;

- Limited Objection of Defendant **Shenandoah Life Insurance Company** to Motion of Lehman Brothers Holdings Inc. Pursuant to Section 105(A) of the Bankruptcy Code and Bankruptcy Rule 7004(A)(1), to Extend Stay of Avoidance Actions and Grant Certain Related Relief **[Dkt. No. 42132]**;
- Response of **Union Investment Institutional GMBH** in Opposition to the Motion of Lehman Brothers Holdings Inc., Pursuant to Section 105(A) of the Bankruptcy Code and Bankruptcy Rule 7004(A)(1), to Extend Stay of Avoidance Actions and Grant Certain Related Relief **[Dkt. No. 42122]**;
- Limited Objection of **PB Capital Corporation** to the Motion of Lehman Brothers Holdings Inc., Pursuant to Section 105(A) of the Bankruptcy Code and Bankruptcy Rule 7004(A)(1), to Extend Stay of Avoidance Actions and Grant Certain Related Relief **[Dkt. No. 42139]**; and
- Part II.B of the Limited Objections of **Nationwide Life Insurance Company** and **Nationwide Mutual Insurance Company** to Joint Motion of Lehman Brothers Holdings, Inc. and Litigation Subcommittee of Creditors' Committee, Pursuant to Section 105(A) of the Bankruptcy Code and Bankruptcy Rule 7004(A)(1), to Extend Stay of Avoidance Actions and Grant Certain Related Relief (noting that the proposed order should include or require a coterminous lifting of the "SPV ADR Stay") **[Dkt. No. 42130].<sup>2</sup>**

Dated: January 27, 2014  
New York, New York

Respectfully submitted,

**FIRST TRUST STRATEGIC HIGH INCOME FUND  
II**

By /s/ Laura Appleby

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